

worked; that is, to work ‘off the clock’. It is for you to decide whether the evidence presented establishes that Citizens Bank had a policy or practice that applied to all testifying plaintiffs and all non-testifying plaintiffs and that caused them all to work off the clock.

Respectfully submitted,

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Dated: September 4, 2019

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, this 4th day of September, 2019, the foregoing Defendant's Proposed Representative Evidence Jury Instruction was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all counsel indicated on the electronic filing receipt. Parties may access this filing through the Court's ECF system.

/s/ Thomas E. Hill

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